

Telecommunications  
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Technology  
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Proprietary Rights  
Complex Litigation  
General Business Law

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EXECUTIVE SECRETARY

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July 17, 2001

Mr. Darrell Whitis  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

RE: Application of NOS Communications, Inc. to Provide Local Resold and  
Facilities-Based Telecommunications Services in Tennessee  
Docket No. 01-00449

Dear Mr. Whitis:

The responses, below, follow the TRA's second, informal, request for information, as presented to the above-referenced applicant for local facilities based and resold local service, NOS Communications, Inc., and is made on their behalf. These responses follow, and are to be incorporated into, NOS Communications, Inc.'s June 29, 2001 Responses to the Tennessee Regulatory Authority's Data Request of June 1, 2001.

## General Responses and Objections

1. The following answers are limited to the Petitioner, NOS Communications, Inc. and are complete and correct as far as Petitioner is aware, according to information available to Petitioner at the present time.
2. Petitioner reserves the right to object to the admissibility of any of these answers or of any document provided herein, in whole or in part, at any hearing or the trial in this matter, on any grounds, specifically including but not limited to materiality, relevance, and privilege.

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3. Petitioner objects to each of the following requests to the extent they seek information that is protected by the attorney-client privilege, the work product doctrine, or otherwise privileged or protected from disclosure, and will not disclose such information.
4. Petitioner objects to each of the following requests to the extent they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
5. Petitioner objects to each of the following requests to the extent that they would require Petitioner to divulge confidential and proprietary business information.
6. Petitioner objects to each of the following requests to the extent that they are broad, vague, ambiguous, and unduly burdensome.

Subject to the foregoing general responses and objections, Petitioner responds as follows:

**REQUEST ONE:** Please identify NOS Communications, Inc.'s Small Business Plan Administrator, as per TCA § 65-5-212.

**ANSWER TO REQUEST ONE:** As noted in NOS' June 29, 2001 Responses to the TRA's Data Request of June 1, 2001, NOS Communications, Inc.'s Small Business Plan Administrator is Mr. Glenn Stockton, Esq., Chief Regulatory and Tariff Counsel to NOS Communications, Inc. Please refer to that earlier filing for other information respecting that plan.

**REQUEST TWO:** Is NOS currently a party to any formal complaint before a State Public Utility Commission?

**ANSWER TO REQUEST TWO:** NOS is not currently a party to any formal complaint before a State Public Utility Commission.

**REQUEST THREE:** Please provide NOS' financial statements for the Year 2000, as well as a Three Year Projection of NOS local service in Tennessee.

**ANSWER TO REQUEST THREE:** Please find enclosed, under seal pursuant to the terms of the Motion for Protective Order filed with NOS' initial Application for a Certificate of Public Convenience and Necessity, NOS' Financial Statements for the Year 2000, and NOS' 3 year projection of revenues for Tennessee.

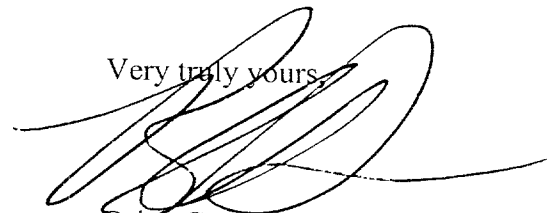
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**REQUEST FOUR:** Please provide a formal Certificate of Service, showing that Applicant has served notice of its application on all eighteen (18) incumbent local exchange telephone companies in Tennessee with a statement regarding the company's intention of operation geographically.

**ANSWER TO REQUEST FOUR:** Please find the appropriate Certificate of Service, enclosed.

I believe these responses satisfy the informal requests for information that you recently related to me over the telephone. Please feel free to contact me should you have any questions or concerns, and please feel free to contact me should you have any questions or concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read 'B. Drumm', with a long horizontal flourish extending to the right.

Brian C. Drumm  
Regulatory Counsel

**Additional Counsel:**

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## CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of attached Notice to Provide Local Resold and Facilities-Based Telecommunications throughout the state of Tennessee by NOS Communications, Inc. was mailed, postage prepaid, to all eighteen (18) incumbent local exchange telephone companies in Tennessee on the attached list, on the 18th day of July, 2001.

  
Cathy Gorfida

Dated: July 18, 2001

**Incumbent Local Exchange Service Providers Certificated In Tennessee  
(Facilities-based)**

<p><b><u>Ardmore Telephone Company, Inc.</u></b></p> <p>P.O. Box 549 517 Ardmore Avenue Ardmore, TN 38449</p> <p>(205) 423-2131 (205) 423-2208 (Fax)</p>	<p><b><u>BellSouth</u></b></p> <p>333 Commerce Street Nashville, TN 37201-3300</p> <p>(615) 214-3800 (615) 214-8820 (Fax)</p>	<p><b><u>Century Telephone of Adamsville</u></b></p> <p>P.O. Box 405 116 N. Oak Street Adamsville, TN 38310</p> <p>(901) 632-3311 (901) 632-0232 (Fax)</p>
<p><b><u>Century Telephone of Claiborne</u></b></p> <p>P.O. Box 100 507 Main Street New Tazewell, TN 37825</p> <p>(423) 626-4242 (423) 626-5224 (Fax)</p>	<p><b><u>Century Telephone of Ooltewah-Collegedale, Inc.</u></b></p> <p>P.O. Box 782 5616 Main Street Ooltewah, TN 37363</p> <p>(423) 238-4102 (423) 238-5699 (Fax)</p>	<p><b><u>Citizens Communications Company of Tennessee</u></b></p> <p>P.O. Box 770 300 Bland Street Bluefield, WV 24701</p>
<p><b><u>Citizens Communications Company Of The Volunteer State</u></b></p> <p>P.O. Box 770 300 Bland Street Bluefield, WV 24701</p>	<p><b><u>Loretto Telephone Company, Inc.</u></b></p> <p>P.O. Box 130 Loretto, TN 38469</p> <p>(931) 853-4351 (931) 853-4329 (Fax)</p>	<p><b><u>Millington Telephone Company, Inc.</u></b></p> <p>4880 Navy Road Millington, TN 38053</p> <p>(901) 872-3311 (901) 873-0022 (Fax)</p>
<p><b><u>Sprint-United</u></b></p> <p>112 Sixth Street Bristol, TN 37620</p> <p>(423) 968-8161 (423) 968-3148 (Fax)</p>	<p><b><u>TDS Telecom-Concord Telephone Exchange, Inc.</u></b></p> <p>P.O. Box 22610 701 Concord Road Knoxville, TN 37933-0610</p> <p>(423) 966-5828 (423) 966-9000 (Fax)</p>	<p><b><u>TDS Telecom-Humphreys County Telephone Company</u></b></p> <p>P.O. Box 552 203 Long Street New Johnsonville, TN 37134-0552</p> <p>(931) 535-2200 (931) 535-3309 (Fax)</p>

**TDS Telecom-Tellico  
Telephone Company,  
Inc.**

P.O. Box 9  
102 Spence Street  
Tellico Plains, TN 37385-  
0009

(423) 671-4600  
(423) 253-7080 (Fax)

**TDS Telecom-  
Tennessee Telephone  
Company**

P.O. Box 18139  
Knoxville, TN 37928-  
2139

(423) 922-3535  
(423) 922-9515 (Fax)

**TEC-Crockett  
Telephone Company,  
Inc.**

P.O. Box 7  
Friendship, TN 38034

(901) 677-8181

**TEC-People's  
Telephone Company,  
Inc.**

P.O. Box 310  
Erin, TN 37061

(931) 289-4221  
(931) 289-4220 (Fax)

**TEC-West Tennessee  
Telephone Company,  
Inc.**

P.O. Box 10  
244 E. Main Street  
Bradford, TN 38316

(901) 742-2211  
(901) 742-2212 (Fax)

**United Telephone  
Company**

P.O. Box 38  
120 Taylor Street  
Chapel Hill, TN 37034

(931) 364-2289  
(931) 364-7202 (Fax)